

KIMBALL JONES, ESQ.

Nevada Bar No.: 12982

JOSHUA P. BERRETT, ESQ.

Nevada Bar No.: 12697

BIGHORN LAW

3675 W. Cheyenne Ave., Suite 100

North Las Vegas, Nevada 89032

Phone: (702) 333-1111

Email: Kimball@Bighornlaw.com

Josh@Bighornlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MONICA E. RAMIREZ HERNANDEZ,

Plaintiff,

v.

CARDENAS MARKETS, LLC; LAMANZA, LLC; NEVADA HISPANIC PUBLICATION ASSOCIATION; A & A ENVIRONMENTAL SERVICES, LLC, DOE STORE MANAGERS I through X; DOE STORE EMPLOYEES I through X; DOE OWNERS 1 through X; DOE PROPERTY MANAGERS I through X; DOE MAINTENANCE EMPLOYEES I through X; DOE JANITORIAL EMPLOYEES I through X; ROE PROPERTY MANAGERS XI through XX; ROE MAINTENANCE COMPANIES XI through XX; ROE OWNERS XI through XX; ROE EMPLOYERS XI through XX; DOES XXI through XXV; ROE CORPORATIONS XXV through XXX, inclusive, jointly and severally,

Defendants.

CASE NO.: 2:23-CV-799-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**
(Third Request)

Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, MONICA E. RAMIREZ HERNANDEZ, by and through her counsel, KIMBALL JONES, ESQ. and JOSHUA P. BERRETT, ESQ., of BIGHORN LAW, and Defendants, CARDENAS MARKETS, LLC and LAMANZA, LLC, by and through their counsel MICHAEL P. LOWRY, ESQ., and JONATHAN C,

PATTILLO, ESQ., hereby stipulated and agree to a one-hundred twenty (120) day continuance of the current discovery deadlines.

I. STATEMENT OF DISCOVERY COMPLETED

1. The parties participated in the Fed. R. Civ. P. 26(f) conference on July 12, 2023.
2. Defendant served their FRCP 26(a) First Initial List of Witnesses and Documents on June 5, 2023.
3. Plaintiff served her FRCP 26(a) Initial List of Witnesses and Documents on July 10, 2023.
4. Plaintiff served her responses to Interrogatories and Request for Production to Cardenas Markets, LLC on July 21, 2023.
5. Plaintiff served her First Supplement to FRCP 26(a) Initial List of Witnesses and Documents on August 9, 2023.
6. Defendant served their Second Supplement FRCP 26(a) Initial List of Witnesses and Documents on August 10, 2023.
7. Defendant served their Third Supplement FRCP 26(a) Initial List of Witnesses and Documents on August 28, 2023.
8. Plaintiff propounded Interrogatories, Request for Admissions and Request for Production of Documents to Cardenas Markets, LLC on October 3, 2023.
9. Plaintiff propounded Interrogatories, Request for Admissions and Request for Production of Documents to Lamanza, LLC on October 3, 2023.
10. Plaintiff served her Second Supplement FRCP 26(a) Initial List of Witnesses and Documents on October 23, 2023.
11. Notice of Deposition of Defendant Cardenas Markets, LLC's FRCP 30(b)(6) Witness was served on October 3, 2023, with an Amended Notice being served on October 19, 2023, setting the deposition for November 8, 2023.

1 12. Plaintiff served her Third Supplement FRCP 26(a) Initial List of Witnesses and
2 Documents on November 21, 2023.

3 13. A Site Inspection was taken on October 19, 2023, at Cardenas Markets, LLC.

4 14. The Deposition of Plaintiff was taken on November 30, 2023.

5 15. Defendant Lamanza, LLC's responses to Interrogatories, Request for Admissions and
6 Request for Production on December 1, 2023.

7 16. Defendant Cardenas Markets, LLC's responses to Interrogatories, Request for Admission
8 and Request for Production on December 1, 2023.

9 17. Plaintiff served her Fourth Supplement FRCP 26(a) Initial List of Witnesses and
10 Documents on January 12, 2024.

11 18. Third Amended Notice of Deposition of Defendant Cardenas Markets, LLC's FRCP
12 30(b)(6) Witness was served on December 12, 2023, setting the deposition for January 30, 2024.

13 19. The deposition of Defendant Cardenas Markets, LLC 30(b)(6) witness was taken on
14 January 30, 2024.

15 20. Plaintiff Monica E. Ramirez Hernandez's Designation of Expert Witnesses was served on
16 February 16, 2024.

17 21. Defendants Cardenas Markets, LLC's FRCP 26.1(a)(2) Expert Disclosure Expert
18 Disclosure was served on February 16, 2024.

19 22. Defendants served their Fourth Supplement FRCP 26(a) Initial List of Witnesses and
20 Documents on April 9, 2024.

21 23. Plaintiff served her Fifth Supplement FRCP 26(a) Initial List of Witnesses and Documents
22 on June 24, 2024.

23 24. Defendant served their Fifth Supplement FRCP 26(a) Initial List of Witnesses and
24 Documents on July 2, 2024.

25. Plaintiff served her Sixth Supplement FRCP 26(a) Initial List of Witnesses and Documents on July 2, 2024.

26. Plaintiff served her Seventh Supplement FRCP 26(a) Initial List of Witnesses and documents on July 12, 2024.

27. Plaintiff Monica E. Ramirez Hernandez served her First Supplement to Designation of Expert Witnesses on July 12, 2024.

28. Plaintiff served her Eighth Supplement FRCP 26(a) Initial List of Witnesses and Documents Expert Witnesses on July 18, 2024.

29. The deposition of Plaintiff's expert Frank Perez is scheduled for September 5, 2024.

30. The deposition of Plaintiff's expert Sharif Hawarey, MD is scheduled for September 5, 2024.

II. DESCRIPTION OF REMAINING DISCOVERY TO BE COMPLETED

1. Depositions of the Parties Experts.

2. Additional discovery as deemed necessary.

The parties have agreed to mediate this case. The mediation is scheduled for September 30, 2024. In order to complete the mediation, motion work, resolve the dispute, and conduct the required depositions, the Parties have agreed to extend the current discovery deadlines for sixty (60) days.

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III. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

Plaintiff and Defendants have agreed to extend the current discovery deadlines herein for sixty (60) days to complete the remaining discovery as outlined above. If approved, the new discovery deadlines would be modified as follows:

TASK	CURRENT DEADLINE	PROPOSED DEADLINE
Close of Discovery	September 11, 2024	December 2, 2024
Initial Expert Disclosures	June 15, 2024	CLOSED
Rebuttal Expert Disclosures	July 12, 2024	CLOSED
Dispositive Motions	October 10, 2024	January 2, 2025
Joint Pre-Trial Order	November 8, 2024	February 2, 2025

IT IS SO STIPULATED AND AGREED.

BIGHORN LAW**WILSON ELSE**

By: /s/ Joshua P. Berrett

By: /s/ Jonathan C. Pattillo

KIMBALL JONES, ESQ.

MICHAEL P. LOWRY, ESQ.

Nevada Bar No.: 12982

Nevada Bar No. 10666

JOSHUA P. BERRETT, ESQ.

JONATHAN C. PATTILLO, ESQ.

Nevada Bar No. 12697

Nevada Bar No. 13929

3675 W. Cheyenne Avenue

6689 Las Vegas Blvd., So., #200

Suite 100

Las Vegas, Nevada 89119

N. Las Vegas, Nevada 89032

Phone: (702) 727-1400

Phone: (702) 333-1111

Attorneys for Defendants

Attorneys for Plaintiff

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Monica E. Ramirez Hernandez v Cardenas Markets, LLC et al.
Case No. 2:23-cv-799-JAC-BNW

ORDER

IT IS SO ORDERED that the prior discovery dates are vacated and reset according to the Stipulation of the parties, as follows:

TASK	NEW DEADLINES
Close of Discovery	December 2, 2024
Initial Expert Disclosures	CLOSED
Rebuttal Expert Disclosures	CLOSED
Dispositive Motions	January 2, 2025
Joint Pre-Trial Order	February 2, 2025

Dated this 15 day of August, 2024.


 UNITED STATES MAGISTRATE JUDGE

Respectfully submitted:

BIGHORN LAW

/s/ Joshua P. Berrett

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North Las Vegas, Nevada 89032

Attorneys for Plaintiff